

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NORTH CAROLINA
SOUTHERN DIVISION

NO. 7:16-CR-60-H-2

UNITED STATES OF AMERICA

v.

RONNIE L. DAVIS

MOTION TO CONTINUE
ARRAIGNMENT

On May 24, 2016, Defendant Ronnie L. Davis was indicted with charges relating to fraud and payment of bribes. [DE 1.]. The pretrial motions deadline is currently set for today, November 29, 2016, and the arraignment is currently set for the December 5, 2016 @ 9:30 a.m. in Greenville before Judge Swank. [DE 52.]. The discovery in this case is voluminous, necessitating counsel to provide the government with a three-terabyte hard drive to download a copy of it to review. Counsel needs additional time for plea negotiations. Co-defendant, William Robert Canupp's arraignment has already been continued to the January 2017 term [D.E. 54.]. Wherefore, counsel requests a continuance of the arraignment date until at least the January 2017 term of court. Assistant United States Attorney David Bragdon does not object to this Motion.

Because the ends of justice served by this motion outweigh the best interests of the public and the Defendant in a speedy trial, such period of delay resulting from this continuance shall be excluded pursuant to 18 U.S.C. § 3161(h)(8)(A).

Respectfully submitted this 29th day of November, 2016.

THOMAS P. McNAMARA
Federal Public Defender

/s/ Katherine E. Shea

KATHERINE E. SHEA
Assistant Federal Public Defender
Attorney for Defendant
Office of the Federal Public Defender
150 Fayetteville Street
Suite 450, Wells Fargo Bldg.
Raleigh, North Carolina 27601
Telephone: 919-856-4236
Fax: 919-856-4477
E-mail: kat_shea@fd.org
Member of NY State Bar
LR 57.1 Counsel Appointed

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a copy of the foregoing was served upon:

David Bragdon

U. S. Attorney's Office
Suite 800, 310 New Bern Ave.
Raleigh, NC 27601
919-856-4530
Fax: 856-4487
Email: david.bragdon@usdoj.gov

by electronically filing the foregoing with the Clerk of Court on November 29, 2016, using the CM/ECF system which will send notification of such filing to the above.

This the 29th day of November, 2016.

/s/ Katherine E. Shea
KATHERINE E. SHEA
Assistant Federal Public Defender
Attorney for Defendant
Office of the Federal Public Defender
150 Fayetteville Street
Suite 450, Wells Fargo Bldg.
Raleigh, North Carolina 27601
Telephone: 919-856-4236
Fax: 919-856-4477
E-mail: kat_shea@fd.org
Member of NY State Bar
LR 57.1 Counsel Appointed